

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 15, 2012

GA2011-22

Jerry Schmitz
Vice President, Engineering
Southwest Gas Corporation
P.O. Box 98510, LVA-581
Las Vegas, NV 89193-8510

SUBJECT: General Order 112-E Audit of the Southwest Gas Corporation, Needles, California
Division Gas Distribution facilities.

Dear Mr. Schmitz:

The staff of Gas Safety and Reliability Branch (GSRB) of the California Public Utilities Commission (CPUC) conducted a General Order (G.O.) 112-E audit of Southwest Gas Corporation, Needles Division gas distribution facilities on May 23-27, 2011.

GSRB staff identified a violation of G.O. 112-E, Reference Title 49 Code of Federal Regulations (49 CFR), Part 192. A Summary of Inspection Findings is enclosed. Please provide a written response within 30 days of your receipt of this letter, indicating corrective measures taken by Southwest Gas Corporation (SWG) to mitigate and prevent recurrence of this violation.

If you have any questions, please call Matthewson Epuna at (213) 576-7014.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Robertson", is written over a horizontal line.

Michael Robertson, P.E.
Program Manager
Gas Safety and Reliability Branch
Consumer Protection and Safety Division (CPSD)

cc: Joel Tran, CPSD/GSRB

SUMMARY OF INSPECTION FINDINGS OF MAY 2011 SWG NEEDLES DISTRICT
AUDIT

G.O. 112-E Audit of Gas Distribution
May 23-27, 2011

Issue: Storage of Plastic PE DRISCOPIPE outside beyond the two years

GSRB staff observed piles of plastic Polyethylene (PE) pipes (DRISCOPIPES 8100) manufactured by Performance Pipe stored outdoor unprotected for more than two years at the SWG Bullhead facility. 49 CFR, Part 192 Section 192.59(a)(1) states:

"§ 192.59 Plastic pipe.

(a) New plastic pipe is qualified for use under this part if:

(1) It is manufactured in accordance with a listed specification; and....."

The listed specification in this matter is the American Society for Testing of Materials (ASTM) D-2513 1999 edition. ASTM D-2513-99, section A1.5.7 states:

"Outdoor Storage Stability-PE pipe stored outdoors and unprotected for at least two years from date of manufacture shall meet all the requirements of this specification. PE pipe stored outdoors for over two years from date of manufacture is suitable for use if it meets the requirements of this specification."

In addition, Title 49 CFR, Part 192 Section 192.321(g)(1) states:

"§ 192.321 Installation of plastic pipe.

(g) Uncased plastic pipe may be temporarily installed above ground level under the following conditions:

(1) The operator must be able to demonstrate that the cumulative aboveground exposure of the pipe does not exceed the manufacturer's recommended maximum period of exposure or 2 years, whichever is less."

SWG provided the Commission staff technical notes from Performance Pipe (DRISCOPIPE 8100) Model Specification which states:

"Section 2.3.....Materials shall be stabilized against ultraviolet deterioration and shall be suitable for unprotected outdoor storage for at least four (4) years."

"Section 2.5 Polyethylene Pipe. Pipe shall be DRISCOPIPE® 8100 polyethylene pipe, and shall be manufactured and tested in accordance with the latest published edition of ASTM D 2513."

The Performance Pipe DRISCOPIPE 8100 Model Specification SWG provided did not reference ASTM D-2513-99. In addition, this "model specification" did not have any technical data to

demonstrate that a segment of that pipe was tested in accordance with ASTM D-2513-99 after it has been exposed or stored outdoors unprotected for more than two years. Based on the data SWG has provided, the Commission has determined that the PE pipes SWG stored outdoors unprotected for more than two years did not comply with 49 CFR, Part 192 sections 192.59(a)(1) and 192.321(g)(1) unless these PE pipes met ASTM D-2513-99 specification requirements and test methods. PE pipes shall not be stored outdoors or exposed to ultraviolet light for more than the plastic pipe manufacturer's recommended maximum period of exposure or maximum of two years, whichever is less, unless the PE pipes meet the ASTM D-2513-99 requirements